

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SONIA VAZQUEZ
Plaintiff,

vs.

WAL-MART STORES TEXAS,
LLC
Defendant.

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CIVIL ACTION NO. 23-04449

PLAINTIFF'S NOTICE OF FIRST SUPPLEMENTAL RULE 26 DISCLOSURES

TO THE HONORABLE UNITED STATES DISTRICT COURT:

COMES NOW, Plaintiff SONIA VAZQUEZ, and notifies the Court that on the 26th day of February 2025, the following was submitted to all counsel of record, pursuant to the Federal Rules of Civil Procedure and Local Rules of the Southern District of Texas:

1. Plaintiff's First Supplemental Rule 26 Disclosures

Respectfully submitted,

THE MENDOZA LAW FIRM, PLLC

By: 

Mathew E. Mendoza
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State Bar Number: 24109548
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Houston, Texas 77006
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COUNSELS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the foregoing instrument was forwarded to all interested counsel in accordance with the Federal Rules of Civil Procedure on this 26th day of February 2025.



Mathew E. Mendoza

PLAINTIFF'S SUPPLEMENTAL RULE 26 DISCLOSURES

FRCP 26(a)(1)(A)(i):

The name and, if known, the address and telephone number of each individual likely to have discoverable information- along with the subjects of that information- that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

RESPONSE:

1. Sonia Vazquez, Plaintiff
c/o Mathew E. Mendoza
720 West Alabama Street
Houston, Texas 77006
Tel: (713) 651-1037
Plaintiff is knowledgeable about the circumstances surrounding the incident made the basis of this lawsuit and the injuries and damages sustained by her therefrom.
2. Wal-Mart Stores Texas, LLC
c/o John A. Ramirez, and Tiffany Walker-Killip
5615 Kirby Drive, Suite 900
Houston, Texas 77005
Tel: (713) 626-1555
Defendant is knowledgeable about the circumstances surrounding the incident made the basis of this lawsuit.
3. Injury Center of Houston - Greenspoint
Lynnette Orrick
12941 North Fwy, #216
Houston, TX 77060
Phone: (713) 771-2225

See designation below.
4. Unicare MRI & Diagnostic Center
Nalyer Iman
7007 North Freeway, Suite 110
Houston, TX 77076
Phone: (713) 691-6700

See designation below.
5. Swiftcare Accident and Injury
5005 W. 34th Street, #103c
Houston, TX 77092
Phone: (833) 794-3874

See designation below.

6. Minivasive Pain & Orthopedics - Spring
Edward Lee, MD
3301 Spring Stuebner Rd. #110
Houston, TX 77389
Phone: (346) 800-6001

See designation below.

7. Townsend Memorial Surgery Center - Spring
David Nguyen, MD
3301 Spring Stuebner Rd.
Houston, TX 77389
Phone: (346) 386-6700

See designation below.

8. Memorial Wellness RX
Nicole Miller
2918 San Jacinto
Houston, TX 77004
Phone: (713) 523-7847

FIRST SUPPLEMENTAL RESPONSE:

9. **Edgar Lopez**
1710 Greens Road, C14
Houston, Texas 77032
Husband to Plaintiff Sonia Vasquez
Edgar Lopez is knowledgeable about Plaintiff Sonia Vasquez's pain and suffering.
10. **A.L., Minor Child**
1710 Greens Road, C14
Houston, Texas 77032
Minor Child of Edgar Lopez and Plaintiff Sonia Vasquez
A.L. is knowledgeable about Plaintiff Sonia Vasquez's pain and suffering.

See designation below.

With respect to the treating physicians and health care providers, you are referred to Plaintiff's Designation of Experts, along with the expert reports that have been and will be prepared by these experts and which have been and will be produced in this case.

All treating physicians, healthcare providers and custodian of records identified above, including all treating physicians, nurses, healthcare providers and custodian of records

identified in the medical and billings records of the above identified facilities, may be called to testify, without limitation, regarding: (1) the Plaintiff's injuries sustained from the subject incident that makes the basis of this lawsuit; (2) the Plaintiff's conditions, symptomatology, diagnosis, and treatment resulting from the incident that makes the basis of this lawsuit; (3) any reasonable and necessary medical treatment related to the incident that makes the basis of this lawsuit or injuries; (4) any reasonable and necessary medical treatment that in all reasonable probability may be necessary in the future; (5) causation of the injuries and/or conditions; (6) reasonable and necessary billing charges for past and/or future treatment; (7) the authenticity and admissibility of any and all medical records and/or billing records pertaining to the Plaintiff; and (8) any pain and suffering, and impairment, and past and future, sustained by Plaintiff. Plaintiff hereby incorporate by reference the medical and billing records of these providers, which have been produced. These medical providers may testify that Plaintiff's injuries were caused by the incident made the basis of this suit, that all medical treatment and billing charges were usual and customary, reasonable and necessary, and caused by the incident made the basis of this suit, and may testify regarding the pain, suffering, and impairment sustained by Plaintiff, past and future.

FRCP 26 (a)(1)(A)(ii):

A copy – or description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

RESPONSE:

See documents produced by the Plaintiff.

FRCP 26(a)(1)(A)(iii):

A computation of each category of damages claimed by the disclosing party- who must also make available to inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered;

RESPONSE:

Medical Expenses:

The following computation of medical expenses that are paid and incurred are based upon the billing records obtained with affidavits that have been provided by the health care providers and which have been produced in this case. The computation of medical expenses that are paid and incurred is as follows:

A. Sonia Vasquez's Medical Expenses-Paid and/or Incurred

Medical	Total	Paid	Adjusted	Balance
Injury Center of Houston	\$4,361.00	0.00	0.00	\$4,361.00
Unicare MRI & Diagnostic Center	\$11,850.00	0.00	0.00	\$11,850.00
Swiftcare Accident and Injury	0.00	0.00	0.00	0.00
Minivasive Pain & Orthopedic	\$18,560.00	0.00	0.00	\$18,560.00
Townsend Memorial Surgery Center	\$34,124.95	0.00	0.00	\$34,124.95
Memorial Wellness RX	\$1,986.03	0.00	0.00	\$1,986.03
TOTAL	\$70,881.98	0.00	0.00	\$70,881.98

The following elements of damage will be determined by the trier of fact: (1) Mental Anguish; (2) Pain and Suffering; (3) Physical Impairment; and (4) Disfigurement.

FRCP (a)(1)(A)(iv):

For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE:

Not applicable.